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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA (San Francisco)

WAYNE JOLLY and CINDY JOLLY.

CASE NO. CV-12-1974 JCS

Plaintiff(s).

V

DEPUY ORTHOPAEDICS, INC.;
JOHNSON & JOHNSON SERVICES,
INC.; JOHNSON & JOHNSON, INC.;
DEPUY INTERNATIONAL LTD;
THOMAS P. SCHMALZRIED, M.D.,
THOMAS P. SCHMALZRIED, M.D., A
PROFESSIONAL CORPORATION; and
DOES 1 through 20, inclusive.

Defendants.

**STIPULATION TO EXTEND TIME TO
RESPOND TO COMPLAINT (L.R. 6-1)**

Complaint served: March 20, 2012
Removal Date: April 20, 2012
Current Response Date: April 27, 2012
Agreed Response Date: May 27, 2012

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Defendants Thomas P. Schmalzried, M.D., a Professional Corporation and Thomas P. Schmalzried, M.D. (“Defendants”) hereby request, and Plaintiffs Wayne Jolly and Cindy Jolly (“Plaintiffs”) hereby agree to Defendants’ request, for an extension of time for Defendants to file a response to Plaintiffs’ Complaint. Plaintiffs’ Complaint was filed on March 2, 2012,

1 Defendants were served on or about March 20, 2012, and the case was removed on April 20,
2 2012.

4 THE PARTIES HAVE AGREED AND HEREBY STIPULATE to extend the time for
5 Defendants to respond to May 27, 2012.

7 DATED: April 24, 2012 SEDGWICK LLP

SEDGWICK LLP

9 By: _____ /s/ Michael M. Walsh
10 Ralph Campillo
11 Wendy Tucker
12 Michael M. Walsh
13 Attorneys for Defendants
14 THOMAS P. SCHMALZRIED, M.D., A
15 Professional Corporation and THOMAS P.
16 SCHMALZRIED, M.D.

SEEEGER • SALVAS LLP

By: /s/ Adam R. Salyas

By: /s/ Adam R. Salvas

Attorneys for Plaintiffs
WAYNE JOLLY and CINDY JOLLY

1 Pursuant to Section X of General Order No. 45 regarding Electronic Court Filing, I
2 hereby certify that the content of this document is acceptable to Adam R. Salvas, counsel for
3 Plaintiffs Wayne Jolly and Cindy Jolly, and that I have obtained counsel's authorization to affix
4 his electronic signature to this document.

5 DATED: April 24, 2012 SEDGWICK LLP

6

7 By: /s/ Michael M. Walsh

8 Ralph Campillo

9 Wendy Tucker

10 Michael M. Walsh

11 Attorneys for Defendant

12 THOMAS P. SCHMALZRIED, M.D., A
13 Professional Corporation and THOMAS P.
14 SCHMALZRIED, M.D.

15 Dated: 4/27/12



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CERTIFICATE OF SERVICE

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is Sedgwick LLP, 801 South Figueroa Street, 19th Floor, Los Angeles, California 90017-5556. On April 26, 2012, I served the within document(s):

STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT (L.R. 6-1)

- MAIL - by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Los Angeles, California.
 - ELECTRONIC MAIL – by serving via CM/ECF to the United States District Court, Central District of California, addressing all parties appearing on the Courts ECF service list.

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I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed at Los Angeles, California on April 26, 2012.

/s/Barbara Fergerson
Barbara Fergerson